

2002 Edmund Halley Drive

Reston, VA 20191 USA

(703) 620-6300

Fax (703) 476-2720

<http://www.comsearch.com>



COMSEARCH

ORIGINAL

EX PARTE OR LATE FILED

October 19, 2000

Ms. Magalie R. Salas  
Office of the Secretary  
Federal Communications Commission  
The Portals Building  
445 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

EX PARTE OR LATE FILED

RECEIVED  
OCT 23 2000  
FCC MAIL ROOM

Re: *Ex Parte*  
DA 00-2013  
ET Docket No. 99-255

Dear Ms. Salas,

Pursuant to Section 1.206(b)(2) of the Commission's rules, please find enclosed an original and one copy of the above-mentioned *ex parte* filing.

Please call the undersigned if you should have any questions.

Respectfully,  
COMSEARCH

  
H. Mark Gibson

Attachments

No. of Copies rec'd 2 & 1  
List A B C D E

2002 Edmund Halley Drive

Reston, VA 20191 USA

(703) 620-6300

Fax (703) 476-2720

<http://www.comsearch.com>

COMSEARCH



RECEIVED

OCT 23 2000

FCC MAIL ROOM

October 19, 2000

Ms. D'wana Terry  
Chief, Public Safety and Private Wireless Division,  
Wireless Telecommunications Bureau  
Federal Communications Commission  
The Portals Building  
445 12<sup>th</sup> Street, SW, 4C-321  
Washington, DC 20554

Re: *Ex Parte*  
DA 00-2013  
ET Docket No. 99-255

Dear Ms. Terry,

Comsearch respectfully submits the following *ex parte* comments in the above-mentioned proceeding.

In our comments to the rulemaking proceeding, ET Docket No. 99-255, Comsearch supported the Commission's proposal to designate a single entity to act as the Wireless Medical Telemetry Service (WMTS) coordinator. By this filing, Comsearch would further like to support the request of The American Society for Healthcare Engineering of the American Hospital Association ("ASHE/AHA") to be designated as the exclusive frequency coordinator for the WMTS.

In over twenty-three years of business, Comsearch has coordinated tens of thousands of microwave paths and satellite earth stations. In addition, as the Prime Frequency Coordinator to UTAM, Inc., we have coordinated the successful deployment of thousands of devices similar to those to be deployed in the WMTS. The availability of a single accurate, comprehensive, and centralized database has been critical to the success of coordinating these deployments. A single database is easier to maintain and ensures the integrity of the data. In addition, a single database will permit easier access by the user community.

An example of a situation where the Commission appointed two competing entities to perform the same task is with the Microwave Relocation Cost-sharing Clearinghouses. The Commission designated both the Personal Communications Industry Association (PCIA) and the Industrial Telecommunications Association, Inc. (ITA) to perform the attendant duties.<sup>1</sup> The Commission stated that, "In keeping with the Commission's goal of fostering competition in the

---

<sup>1</sup> See, *Amendment of the Commission's Rules Regarding a Plan for Sharing the Costs of Microwave Relocation*, WT Docket No. 95-157, DA 96-1298.

telecommunications marketplace, we find that the benefits of having two clearinghouses outweigh any disadvantages.... We believe that in the absence of competition, a single clearinghouse would have less incentive to keep its prices/costs low.”<sup>2</sup> However, since the designation of two clearinghouses in 1996, PCIA has emerged as the *de facto* clearinghouse. In addition, due to the time limited nature of this service (i.e., it will last only until all cost-sharing obligations have been expunged), and due to the limited number of customers, the marketplace has ensured that prices/costs have been kept low. Competition has been a minimal factor. Comsearch believes the same dynamics will be in force in the case of the WMTS, and a dearth of competition should not foster exorbitant fees.

We believe the coordination of WMTS devices will closely resemble the coordination of Unlicensed Personal Communications Service (UPCS) devices, which are coordinated solely by UTAM. Although UTAM has a much broader role than the eventual coordinator of WMTS devices<sup>3</sup>, there are many similarities, especially with the database. UTAM relies upon a single database to track product deployments and perform spectrum management duties. As the Prime Frequency Coordinator for UTAM, we can state categorically that the UPCS coordination process would be severely hampered if UTAM were required to compete with another coordination entity. Therefore, we believe the process to coordinate WMTS devices would itself be unduly hampered if there were multiple coordinators, and we urge the Commission to designate a single entity as frequency coordinator in the WMTS.

Comsearch would further like to support the request of ASHE/AHA to be designated as the single frequency coordinator for the WMTS. The record of ASHE/AHA in this proceeding demonstrates an unequivocal knowledge and appreciation of the issues and the entities involved. In addition, ASHE/AHA is perhaps more familiar than any other interested party with all of those in the medical telemetry community, and should find it easier to work impartially with those wishing to deploy product in the WMTS. Thus, we urge the Commission to designate ASHE/AHA as the single frequency coordinator for the WMTS.

---

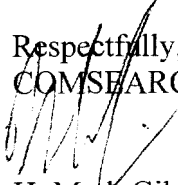
<sup>2</sup> See *Supra* at 23.

<sup>3</sup> The role of UTAM, Inc. is to perform various spectrum management duties including equipment certification and location verification to ensure interference-free operation of UPCS devices in spectrum shared with incumbent microwave links. In addition, UTAM is responsible for managing the relocation of these incumbent microwave links as needed.

Ms. D'wana Terry  
October, 19, 2000  
Page 3

Please call the undersigned if you should have any questions.

Respectfully,  
COMSEARCH



H. Mark Gibson

cc: Mr. Herb Zeiler, Federal Communications Commission  
Mr. Jeffery Tobias, Federal Communications Commission  
Mr. Dale Woodin, American Hospital Association  
Mr. Larry Movshin, WILKINSON BARKER KNAUER, LLP  
Mr. Tim Cooney, WILKINSON BARKER KNAUER, LLP